

A717
Site: Herculaneum Pond
ID # MO0000000323
Break: 20
Other: 12-10-02
cm

THE
DOE RUN
COMPANY
SMELTING DIVISION

RECEIVED
DEC 12 2002
SUPERFUND DIVISION

Aaron W. Miller
Environmental Manager of Primary Smelting
amiller@doerrn.com

December 10, 2002

Bruce Morrison
USEPA Region VII
901 North 5th
Kansas City, Kansas 66101

Re: Herculaneum Yard Restoration

Dear Bruce:

As requested in your letter of November 27, 2002, I met with Jim Silver to discuss the list of yards compiled by Gene Gunn during a recent visit to Herculaneum on November 19th and 20th.

We agree that some of the yards may require some work in the spring when the grass comes up and some slope stabilization may also be necessary. We have been and will continue to address these areas. In the future we will provide you with a detail of re-work performed either by Doe Run or its contractor.

Specifically, I would like to address the bullet points made in you November 27th letter.

1. backfill material is required to be of similar quality as the original yard soil;
As we have discussed, the soil in Herculaneum is a very rich, black soil. We cannot replace it with soil of that quality, however we are using a good quality soil from local farms.
2. yards must be backfilled to original lines and grades;
Yards are returned to their original grades unless the owner requests otherwise. In the event that the soil settles out or washes out Doe Run or its contractor has been filling in the low areas, re-grading, re-seeding, re-fertilized and re-strawing.
3. specific compaction and scarification procedures must be followed in order to properly prepare soil for seeding.
All yards are compacted after soil is replaced. Scarification is provided either mechanically if size of the yard permits or by hand if equipment cannot access the areas. Once completed, the yard is seeded, fertilized and strawed. Compaction and scarification procedures are followed.



4. excavated areas are to be seeded, fertilized and strawed;

Excavated areas are first refilled with soil, then seeded, fertilized and strawed.

5. grass is restored

In areas where there is insufficient grass growth, no grass growth, wash outs or other problems, either Doe Run or its contractor will, with the owners permission, return to the home and continue to work until grass is restored, owner is satisfied or due to other problems (i.e. High traffic area and no grass can be grown) we must inform the owner that we have completed our obligation.

6. during restoration activities, Doe Run "will maintain contact with property owner addressing any concerns which may arise";
7. when Doe Run believes restoration is complete, a walk through will be scheduled with the property owner;
8. punchlist items requested by the property owner will be addressed

Doe Run maintains contact with the property owner not only during restoration activities but also before and after restoration. Each property has a file with all documentation pertaining to that property. After restoration the owner completes a "Completion Agreement Form". Any complaints or concerns the owner has is listed and must be completed. Once the work is completed to the owners' satisfaction they sign. On or attached to the form is a record of what we did and when we did it.

Also, there is an EPA/City Complaint Form. When Doe Run receives a Complaint Form either some one from Doe Run or its contractor will visit the property owner and request access to fix the complaint. A copy of the Complaint Form is put into the file along with what we did and when we did it.

Sometimes we receive letters or calls from citizens. A visit is made by either Doe Run or its contractor and access is requested to fix the complaint. A record of the call or the letter is entered into the file along with an explanation of what we did and when we did it.

Furthermore, Doe Run had explained to many of the owners that due to the poor growing conditions last summer that we would be back in the fall to re-work their yards. Attached are status reports on the re-work on those yards. Once again the file contains what we did and when we did it.

To conclude, DOE RUN is committed to making things right in Herculaneum. We are working with the citizens, we are consistent in our work, we are resolving citizens' complaints and we will continue to do so.

If you would like to review our records please contact me at your earliest convenience so that we can schedule such a meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron W. Miller". The signature is fluid and cursive, with the first name "Aaron" and last name "Miller" clearly distinguishable.

Aaron Miller

Environmental Manager of Primary Smelting
The Doe Run Company

Cc: Clif Gray, Doe Run
David Mosby, MDNR

Miller, Aaron

From: Griffith, Tom
Sent: Wednesday, September 25, 2002 6:16 AM
To: Lanzafame, Jim
Cc: Miller, Aaron; Walker, Gary
Subject: YARD PROGRESS REPORT

TO: JIM LANZAFAME
FROM: GRIFF
SUBJECT: YARD PROGRESS REPORT
DATE: 9/25/02
CC: A.M. & G.W.

329, 323, and 317 Station St. (church property)
Seeded and Fertilized COMPLETED 9/23/02

NO# 1 Parkwood ct. (city hall and park)
Seeded and Fertilized COMPLETED 9/24/02

485 St. Joseph St
Notice to start handed to owner 9/23/02
Plan to rake up rocks, seed and fertilize

441 Main St.
Notice to start left on door 9/23/02
Plan to rake up rocks, seed and fertilize

685 Main St.
Notice to start left on door 9/23/02
Plan to fertilize and seed

679 Main St.
Notice to start left on door 9/23/02
Plan to fertilize and seed

711 Circle St.
Notice to start handed to (renter) 9/23/02
Explained we would fertilize and seed
Renter requested we NOT
Renter did request some fence damage be repaired, I gave that information to
G.W. to discuss with E.R. group 9/23/02

407 Burris St.
Notice to start handed owner 9/23/02
Plan to seed and fertilize

438 Washington St.
Notice to start Handed owner 9/23/02

12/10/2002

Plan to seed and fertilize

561 Main St.

Spoke with owner 9/13/02 (Jim and I)

Plan to seed and fertilize yard COMPLETED 9/17/02

Plan to aerate yard COMPLETED 9/17/02

Plan to wash home COMPLETED 9/16/02

Plan to seal drive way cracks COMPLETED 9/18/02

Plan to coat drive way with sealer COMPLETED 9/25/02

465 Thurwell

Plan to seed and fertilize

453 Thurwell

Plan to seed and fertilize

429 Thurwell

Plan to seed and fertilize

Note need access permission first

448 St. Joseph

Plan to seed and fertilize

453 St. Joseph

Plan to seed and fertilize

428 Lincoln

Plan to seed and fertilize

479 Main St.

Plan to seed and fertilize

12/10/2002

Miller, Aaron

From: Griffith, Tom
Sent: Monday, October 21, 2002 8:19 AM
To: Lanza fame, Jim
Cc: Miller, Aaron; Walker, Gary
Subject: YARD PROGRESS REPORT

TO: JIM LANZAFAME
FROM: GRIFF
SUBJECT: YARD PROGRESS REPORT
DATE: 10/21/02
CC: A.M. & G.W.

329, 323, and 317 Station St. (church property)
Seeded and Fertilized COMPLETED 9/23/02

NO# 1 Parkwood ct. (city hall and park)
Seeded and Fertilized COMPLETED 9/24/02

485 St. Joseph St
Notice to start handed to owner 9/23/02
Plan to rake up rocks, seed and fertilize
Owner requested we wait until he cuts grass we agreed
OWNER HAS QUESTIONS ON WHO IS GOING TO FILL HIS YARD, I
WILL CONTACT GARY ON THIS
Work is progressing
Should complete 10/16/02
COMPLETED 10/17/02

441 Main St.
Notice to start left on door 9/23/02
Plan to rake up rocks, seed and fertilize
OWNER HAS QUESTIONS ON WHAT IF THIS DOES NOT CORRECT THE PROBLEM,
CLAIMS SHE IS DISCUSSING WITH DNR. Gary I told her one of us would contact her. I am
vacationing after to day please make that contact.
We have completed seeding and fertilizing, some straw work was done more may
be needed on the south side I am looking at
441 Main St. (SECOND TRIP)
Notice left on door 10/8/02
Plant to rake bare spots and seed and straw them on 10/17/02
COMPLETED 10/18/02

685 Main St.
Notice to start left on door 9/23/02
Plan to fertilize and seed
COMPLETED 9/25/02

679 Main St.

12/10/2002

Notice to start left on door 9/23/02
Plan to fertilize and seed
COMPLETED 9/25/02

711 Circle St.

Notice to start handed to (renter) 9/23/02
Explained we would fertilize and seed
Renter requested we NOT
Renter did request some fence damage be repaired, I gave that information to
G.W. to discuss with E.R. group 9/23/02
I spoke with E.R. they will fix fence 10/03/02
Fence repaired 10/7/02 COMPLETED 10/07/02

407 Burris St.

Notice to start handed owner 9/23/02
Plan to seed and fertilize
COMPLETED 9/25/02

438 Washington St.

Notice to start Handed owner 9/23/02
Plan to seed and fertilize
COMPLETED 9/25/02
Fence issue is being taken care of by E.R.
E.R. fixing 10/8/02

561 Main St.

Spoke with owner 9/13/02 (Jim and I)
Plan to seed and fertilize yard COMPLETED 9/17/02
Plan to aerate yard COMPLETED 9/17/02
Plan to wash home COMPLETED 9/16/02
Plan to seal drive way cracks COMPLETED 9/18/02
Plan to coat drive way with sealer COMPLETED 9/25/02
Spoke with Mr. Carter on 9/26/02 He is happy with work completed and is getting
bird house we both said we will have to give grass a chance and see where we are
as of 10/03/02 J.L. will handle bird house issue
COMPLETED PER JIM 10/09/02

465 Thurwell

Plan to seed and fertilize
Notice to start left on door 9/26/02
COMPLETED 9/27/02

453 Thurwell

Plan to seed and fertilize
Notice to start left on door 9/26/02
HOLD PER G.W.
Arron Miller has taken and will investigate complaints 10/8/02

12/10/2002

429 Thurwell

Plan to seed and fertilize
Note need access permission first
Notice to start left on door 9/26/02
COMPLETED 9/27/02

448 St. Joseph

Plan to seed and fertilize
Notice to start left on door 9/26/02
COMPLETED 9/27/02

453 St. Joseph

Plan to seed and fertilize
Notice to start handed to owner 9/26/02
COMPLETED 9/26/02

428 Lincoln

Plan to seed and fertilize
Notice to start left on door 9/26/02
COMPLETED 9/26/02

479 Main St.

Plan to seed and fertilize
Notice to start left on door 9/26/02
COMPLETED 9/26/02

649 Main St.

Plan to rake **COMPLETED 10/07/02**
Plan to seed and fertilize **COMPLETED 10/07/02**
Notice to start left on door 10/4/02
Debbie Guthery called 10/07/02 and asked about weed killer
I gave information to G.W.
G.W. has explained cliff's orders this is now **COMPLETED 10/7/02**

437/439 Hill St

Rake Bare spots
Seed and fertilize
Straw bare spots
Notice to start left on door 9/26/02
COMPLETED 10/07/02

407 Hill St.

Spread dirt
Rake where needed

12/10/2002

Seed and Fertilize entire lawn
Notice handed owner 10/04/02
Owner stopped crew 10/07/02 and Aaron to visit on owners concerns and
request 10/07/02
E.R. has delivered the dirt we started spreading 10/11/02
COMPLETED 10/17/02

963 Church St
Seed and fertilize
Notice to start left on door 10/4/02
COMPLETED 10/4/02

491 Long St.
Seed and Fertilize
Notice to start left on door 10/4/02
COMPLETED 10/4/02

263 Reservoir
Seed and fertilize
Notice to start handed to owner
COMPLETED 10/4/02

781 Joachim Ave.
plan to rake, seed, fertilize and straw as needed
Notice handed owner 10/8/02
COMPLETED 10/11/02

783 Joachim Ave.
Plan to rake, seed, fertilize and straw as needed
Notice left on door 10/8/02
COMPLETED 10/11/02

Miller, Aaron

From: Griffith, Tom
Sent: Thursday, October 24, 2002 6:07 AM
To: Lanzafame, Jim
Cc: Miller, Aaron; Walker, Gary
Subject: YARD PROGRESS REPORT

TO: JIM LANZAFAME
FROM: GRIFF
SUBJECT: YARD PROGRESS REPORT
DATE: 10/24/02
CC: A.M. & G.W.

329, 323, and 317 Station St. (church property)

Seeded and Fertilized COMPLETED 9/23/02

**** RETURNED 10/22/02 REPAIRED WATER DAMAGE SEEDED, FERTILIZED
AND STRAW ALSO PUT UP RAIN RUN OFF BARRIER**

NO# 1 Parkwood ct. (city hall and park)

Seeded and Fertilized COMPLETED 9/24/02

485 St. Joseph St

Notice to start handed to owner 9/23/02

Plan to rake up rocks, seed and fertilize

Owner requested we wait until he cuts grass we agreed

**OWNER HAS QUESTIONS ON WHO IS GOING TO FILL HIS YARD, I
WILL CONTACT GARY ON THIS**

Work is progressing

Should complete 10/16/02

COMPLETED 10/17/02

441 Main St.

Notice to start left on door 9/23/02

Plan to rake up rocks, seed and fertilize

**OWNER HAS QUESTIONS ON WHAT IF THIS DOES NOT CORRECT THE PROBLEM,
CLAIMS SHE IS DISCUSSING WITH DNR. Gary I told her one of us would contact her. I am
vacationing after to day please make that contact.**

We have completed seeding and fertilizing, some straw work was done more may
be needed on the south side I am looking at

441 Main St. (SECOND TRIP)

Notice left on door 10/8/02

Plant to rake bare spots and seed and straw them on 10/17/02

COMPLETED 10/18/02

685 Main St.

Notice to start left on door 9/23/02

Plan to fertilize and seed

COMPLETED 9/25/02

12/10/2002

679 Main St.

Notice to start left on door 9/23/02

Plan to fertilize and seed

COMPLETED 9/25/02

**** RETURNED ON 10/23/02 AND ADDED ADDITIONAL SEED, FERTILIZER AND STRAW**

711 Circle St.

Notice to start handed to (renter) 9/23/02

Explained we would fertilize and seed

Renter requested we NOT

Renter did request some fence damage be repaired, I gave that information to

G.W. to discuss with E.R. group 9/23/02

I spoke with E.R. they will fix fence 10/03/02

Fence repaired 10/7/02 COMPLETED 10/07/02

407 Burris St.

Notice to start handed owner 9/23/02

Plan to seed and fertilize

COMPLETED 9/25/02

438 Washington St.

Notice to start Handed owner 9/23/02

Plan to seed and fertilize

COMPLETED 9/25/02

Fence issue is being taken care of by E.R.

E.R. fixing 10/8/02

**** RETURNED ON 10/23/02 AND ADDED SEED, FERTILIZER AND STRAW**

561 Main St.

Spoke with owner 9/13/02 (Jim and I)

Plan to seed and fertilize yard COMPLETED 9/17/02

Plan to aerate yard COMPLETED 9/17/02

Plan to wash home COMPLETED 9/16/02

Plan to seal drive way cracks COMPLETED 9/18/02

Plan to coat drive way with sealer COMPLETED 9/25/02

Spoke with Mr. Carter on 9/26/02 He is happy with work completed and is getting bird house we both said we will have to give grass a chance and see where we are as of 10/03/02 J.L. will handle bird house issue

COMPLETED PER JIM 10/09/02

465 Thurwell

Plan to seed and fertilize
Notice to start left on door 9/26/02
COMPLETED 9/27/02

453 Thurwell

Plan to seed and fertilize
Notice to start left on door 9/26/02
HOLD PER G.W.
Arron Miller has taken and will investigate complaints 10/8/02

429 Thurwell

Plan to seed and fertilize
Note need access permission first
Notice to start left on door 9/26/02
COMPLETED 9/27/02

448 St. Joseph

Plan to seed and fertilize
Notice to start left on door 9/26/02
COMPLETED 9/27/02

453 St. Joseph

Plan to seed and fertilize
Notice to start handed to owner 9/26/02
COMPLETED 9/26/02

**** RETURNED ON 10/22/02 RAKED, SEEDED, FERTILIZED AND STRAW.**

428 Lincoln

Plan to seed and fertilize
Notice to start left on door 9/26/02
COMPLETED 9/26/02

479 Main St.

Plan to seed and fertilize
Notice to start left on door 9/26/02
COMPLETED 9/26/02

649 Main St.

Plan to rake COMPLETED 10/07/02
Plan to seed and fertilize COMPLETED 10/07/02
Notice to start left on door 10/4/02
Debbie Guthery called 10/07/02 and asked about weed killer
I gave information to G.W.
G.W. has explained cliffs orders this is now COMPLETED 10/7/02

437/439 Hill St

Rake Bare spots
Seed and fertilize

12/10/2002

Straw bare spots
Notice to start left on door 9/26/02
COMPLETED 10/07/02

**** RETURNED 10/23/02 AND ADDED SEED AND FERTILIZER**

407 Hill St.

Spread dirt
Rake where needed
Seed and Fertilize entire lawn
Notice handed owner 10/04/02
Owner stopped crew 10/07/02 and Aaron to visit on owners concerns and request 10/07/02
E.R. has delivered the dirt we started spreading 10/11/02
COMPLETED 10/17/02

963 Church St

Seed and fertilize
Notice to start left on door 10/4/02
COMPLETED 10/4/02

491 Long St.

Seed and Fertilize
Notice to start left on door 10/4/02
COMPLETED 10/4/02

263 Reservoir

Seed and fertilize
Notice to start handed to owner
COMPLETED 10/4/02

781 Joachim Ave.

plan to rake, seed, fertilize and straw as needed
Notice handed owner 10/8/02
COMPLETED 10/11/02

**** RETURNED ADDED SEED, FERTILIZER AND STRAW**

783 Joachim Ave.

Plan to rake, seed, fertilize and straw as needed
Notice left on door 10/8/02
COMPLETED 10/11/02

**** RETURNED ADDED SEED AND FERTILIZER**

12/10/2002

Miller, Aaron

From: Griffith, Tom
Sent: Friday, November 08, 2002 6:50 AM
To: Lanzafame, Jim
Cc: Miller, Aaron; Walker, Gary
Subject: YARD PROGRESS REPORT

TO: JIM LANZAFAME
FROM: GRIFF
SUBJECT: YARD PROGRESS REPORT
DATE: 11/8/02
CC: A.M. & G.W.

454 Hill St.

Spoke with owner on 10/26/02
Owner requested help with yard too many bare spots
Informed owner we will re-work yard next week or weather permitting
Notice left 11/08/02

507 Long St.

Owner filed complaint with E.P.A. about fence damage
Walker has 10/25/02

558 Reservoir St.

Owner complained to E.P.A. about fence damage
Walker has 10/25/02

202 Joachim Ave.

Owner request re-seed
Notice left 11/08/02

835 Brown St.

Owner request erosion problem fixed and reseed
Notice left 11/08/02

519 Joachim St.

Wash out front side of house by gutter drain needs fixed
Notice left 11/08/02

12/10/2002

Miller, Aaron

From: Griffith, Tom
Sent: Wednesday, November 13, 2002 6:02 AM
To: Lanza fame, Jim
Cc: Miller, Aaron; Walker, Gary
Subject: YARD PROGRESS REPORT

TO: JIM LANZAFAME
FROM: GRIFF
SUBJECT: YARD PROGRESS REPORT
DATE: 11/8/02
CC: A.M. & G.W.

454 Hill St.

Spoke with owner on 10/26/02
Owner requested help with yard too many bare spots
Informed owner we will re-work yard next week or weather permitting
Notice left 11/08/02
COMPLETED 11/12/02
Promised owner we will return in the spring and walk through yard with him

507 Long St.

Owner filed complaint with E.P.A. about fence damage
Walker has 10/25/02

558 Reservoir St.

Owner complained to E.P.A. about fence damage
Walker has 10/25/02

202 Joachim Ave.

Owner request re-seed
Notice left 11/08/02
COMPLETED 11/12/02 USED SEED FERTILIZER AND STRAW but owner is still complaining about ruts. I will tell him we will revisit on the spring and walk through yard with him

835 Brown St.

Owner request erosion problem fixed and reseed
Notice left 11/08/02
COMPLETED 11/13/03 WILL RE-ADDRESS IN THE SPRING

519 Reservoir St.

Wash out front side of house by gutter drain needs fixed
Notice left 11/08/02
COMPLETED 11/12/02

Griff

12/10/2002